

Neal, Arthur

From: Patty.Mann@marineharvest.com
Sent: Friday, April 07, 2006 3:50 PM
To: NOSB Livestock
Subject: comments regarding interim final report of the aquaculture working group
Attachments: ATTACHMENT.TXT

- The section discussing the use of land animal protein waste ("laps") and vegetable substitution is very honest and clear and should be congratulated, it does however not resolve some fundamental conflicts between organic meaning "as natural as possible" and organic practices being "as ecologically responsible as possible" by utilizing and recycling waste (laps) and optimizing the use of very sustainable resources (vegetables). Ultimately we agree with the recommendation and that the philosophy of "as natural as possible" should prevail.
- This does however have ramifications that become more and more difficult to solve. For instance, trimmings from pelagic factories should be used in organic fishmeal production. However, such trimmings contain elevated proportions of skin and other tissues where contaminants would be more concentrated than in whole fish used in standard fishmeal production. Hence the concept of contaminants having to be at a level comparable to the lowest levels in commercially available fishmeals is impossible unless such contaminants are removed (not a very organic process resulting in highly contaminated activated carbon products). This also makes such fishmeals then very expensive.
- Yet - getting back to the first point - the use of vegetable substitution would enable organic produce to achieve a lower than wild or conventional realm of contamination. So maybe vegetable substitution should be o.k.
- I am not clear as to the use of **Phaffia** for pigmentation or use as a protein supplement that has the added benefit of pigmenting the fish. I think I understand from the text that it is allowed as it is a microbe fermented supplement that will be able (should be able) to be certified.
- **Parasitocides and medicines** should be permitted, but the rule for harvested fish and produce for the consumer should carry no residues. In other words when animal welfare requires such treatments, so be it (and these should be less common than for conventional production) as long as there is a zero residue policy. The zero also needs to be defined as it can mean "no detection" or below "statutory quoted limits of detection" (bare in mind that detection limits change and typically continue to increase in sensitivity). We have a zero policy for our products, and I think that is really something good from a consumer point of view.
- **Photoperiod manipulation** is not discussed (S0 or half year smolts), we currently do not use this in our production and it would therefore currently suit us for this to remain. The general philosophy of as natural as possible would exclude this.
- **Separation** - organic farms should be dedicated to organic production and should not be able to produce both conventional and organic.
- The 5% ruling we would like to contest, in that this ignores the length of time that an animal may have lived under non-organic conditions. The fastest harvest after transfer to sea can be say 15 months, having lived in freshwater for 16 months prior to that of which it fed exogenously 4 say 12 months. The smolt would go to sea at say 70g. and reach 250g. after 3 months so that its organic life could within this rule be only 12 of its 31 month life = just less than 40%. We would propose that the juvenile production should also be organic if and when the juvenile period can represent a significant proportion of the animal's life cycle.
- Environmental and as natural as possible in the case of salmon should see its **rearing environment** classed as "oceanic". According to our production, we would contest that salmon

should be reared under oceanic conditions (however defined) and this should not allow estuarine conditions (reduced salinity and questionable impacts on estuarine ecosystems). Polyculture to deal with waste nutrients don't apply and would be very difficult, yet because of the oceanic nature this impact is negligible.

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From: Patty.Mann@marineharvest.com
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- Salmon production is not currently possible without some use of antiparasitic treatments. Use of cleaner fish alone will not maintain the current limits for sealice on fish and of course there is the question of sustainable use of cleaner fish. Is it possible to obtain copies of documents 205.603 and 205.604 referred to in this submission?
- The requirement for all aquaculture facilities to have a nutrient management plan with the objective of nutrient recovery for other plant and animal crops is not practical for marine systems - particularly in cases where the sites are exposed with fast currents. Rather, this section should encourage good feed and waste management practices to minimize waste in addition to the use of impact assessment as a monitoring tool.

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